| UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK |                    |
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| UNITED STATES OF AMERICA,                                  | NOTICE OF MOTION   |
| VS.  | No. 14-CR-314 (RA) |
| RENE CARDONA,  Defendant.                                  |                    |

PLEASE TAKE NOTICE, that upon the annexed declaration of Daniel DeMaria, Esq., sworn September 8<sup>th</sup>, 2014, the exhibits attached thereto, and a Memorandum of Law, the undersigned will move this Court, before the Honorable Ronnie Abrams, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York, 10007, at a time to be designated by the Court, for an order, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, suppressing evidence obtained in violation of the Fourth and Fifth Amendments to the United States Constitution, or granting an evidentiary hearing on this motion, and granting such further relief as the Court deems just and proper.

Dated:

White Plains, New York September 8<sup>th</sup>, 2014

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